

UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF MASSACHUSETTS
BOSTON DIVISION

STUDENTS FOR FAIR ADMISSIONS, INC.,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF HARVARD
COLLEGE (HARVARD CORPORATION),

Defendant.

Civil Action No. 1:14-cv-14176-ADB

DECLARATION OF MARLYN E. MCGRATH

I, Marlyn E. McGrath, hereby state under oath:

1. I am the Director of Admissions for Harvard College.
2. I am submitting this Declaration in support of Harvard's Opposition to Plaintiff Students for Fair Admissions, Inc.'s ("SFFA") Motion to Compel.
3. The statements made herein are based on my personal knowledge and upon information made available to me in my official capacity as Director of Admissions.
4. I joined Harvard's Office of Admissions and Financial Aid ("Admissions Office") nearly thirty years ago when I became Director of Admissions for Harvard and Radcliffe Colleges in 1987. I have held essentially the same position throughout this time period, and my title is now Director of Admissions for Harvard College.
5. In my capacity as Director of Admissions, I oversee the work of Harvard's Admissions Office. More specifically, I participate in the evaluation of freshman and transfer applicants for admission to Harvard College, manage the work of more junior admissions officers, help coordinate the alumni interviewing process, recruit potential applicants for

admission, and participate in the development of policies and guidelines for Harvard College's admissions process.

Transfer Applicants

6. Harvard College admits very few transfer applicants every year. This is the case in large part because the retention rate at Harvard College is quite high—very few matriculating freshmen and sophomores are unable or choose not to continue their education at Harvard. As a result, the number of available spaces for transfer admission fluctuates from year to year (and sometimes is zero). In the event Harvard College does have spaces for a small number of transfer students, we look for high-achieving students at their current college who will contribute to the house system and the college as a whole.

7. For the 2013 to 2014 admissions cycle, 1,290 applicants for transfer admission applied to Harvard College. Of those applicants, Harvard College admitted 15 applicants.

8. For the 2014 to 2015 admissions cycle, 1,429 applicants for transfer admission applied to Harvard College. Of those applicants, Harvard College admitted 21 applicants.

Alumni Interviewers

9. Harvard College is fortunate to have a large number of alumni/ae who volunteer each year on its behalf to conduct interviews of applicants for freshman admission. Across the globe, the number of alumni admissions volunteers totals more than 15,000.

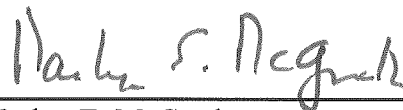
10. I understand that SFFA has requested the names and contact information for all alumni/ae interviewers from California, Connecticut, Washington, D.C., New Jersey, and certain counties in Georgia, Illinois, Maryland, New York, Texas, Virginia, and Washington for particular admissions cycles.

11. More than 5,000 Harvard alumni/ae conducted interviews of applicants for the graduating classes of 2018 and 2019 in the regions that SFFA has identified (i.e. for the admissions cycles of 2013-2014 and 2014-2015). The typical alumnus/a conducts an average of 3 interviews during any one admissions cycle.

12. Involving alumni interviewers in this litigation (for example, by preparing for and participating in a deposition) would impose significantly on Harvard's alumni who have donated their time and efforts to the College. Based on my experience and my interactions with alumni, I believe that drawing alumni volunteers into this litigation could significantly affect their willingness and the willingness of other alumni to volunteer as alumni interviewers.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this day, July 30, 2015.

A handwritten signature in dark ink, appearing to read "Marlyn E. McGrath", is written over a horizontal line.

Marlyn E. McGrath
Director of Admissions
Harvard College